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From: Frankel, Donald (ENRD)
Sent: Fri 7/29/2016 9:44:32 PM
Subject: In re Maxus Energy Corp.
[Addendum Language sought by DOJ 7.29.16.doc](#)

Dear Counsel:

I plan to attend the depositions next week of Messrs. Dietz and Winn. Matt Nicholson informs me that the Debtors have requested that persons attending the deposition execute Exhibit A of the Confidentiality Agreement and Stipulated Protective Order ("Order"). Please be advised that DOJ has certain concerns with the language of the Order. I propose that the parties agree to include the attached addendum to the Order. In view of the short timeframe involved here, I suggest that I execute Exhibit A subject to the enclosed language (which would be attached to my signature page). After the depositions, the parties could enter into a stipulation requesting that the Court include this provision in the Protective Order. (If agency counsel attend the deposition, they could also sign Exhibit A subject to this addendum.)

Don

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